

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Cr. No. 08-10835-RGS
)	
)	
PRUDENCE KANTENGWA,)	
a/k/a PRUDENTIENNE KANTENGWA,)	
Defendant)	

Government's Witness and Exhibit List

The United States respectfully submits the following list of anticipated witnesses and exhibits. The government anticipates certain evidence, notably those implicated by the government agents, being introduced without the need for multiple witnesses from each agency. In an abundance of caution the government is being over-inclusive. This list is subject to reasonable supplementation.

The government's informed estimate for the length of trial is up to two weeks.

Potential Witnesses

Lorie Heinrich - USCIS Newark
Ethan Taubes - USCIS Newark
Michael Spaniol - USCIS Boston
Dorothy Michaud - USCIS Boston
Robert Halpin - EOIR Immigration Court
Tony Radway - CBP
Neil Algarian - CBP
John Brooks - CBP
Keeper of Records - CBP
Richard Wallen - Colorado
Margaret Macallum - Dept. State - Mexico City
Beth Payne - Dept. State - Washington, DC
Thomas Brian Andersen - ICE
Candice Kelley - ICE
Timothy Irving - ICE

Michael McGonigle - ICE
Edward Bradstreet - ICE
Mark Furtado - ICE
Randy Reeves - ICE
Augustin Iyamurere - Rwanda
Alphonse Rutyasire - Rwanda
Emmanuel Niyitigeka - Rwanda
Jean-Damascene Nshimiyimana - Rwanda
Charles Bugurimfura - Rwanda
Denise Nassar - USCIS Translator
Robert Kayinamura - Washington, DC - Translator
Dora Urujeni - Rwanda - Translator

Expert Witness

Timothy Longman - Boston University
Scott Strauss - Univ. Wisconsin
Eric Benn - Dept. Defense

Anticipated Government Exhibits

- 1a. Authenticity Certification for materials in Defendant's A-file
- 1b. Authenticity Certification for Defendant's Visa File
- 1c. Authenticity Certification for Sonarwa Business Records
- 1d. Authenticity Certification Rwandan Official Records
- 1e. Certification French Translation
- 1f. Certification Kinyarwanda Translation
- 1g. Certificate of authenticity of audio tapes of Immigration proceedings
2. Non-Immigrant Visa applications and Supporting materials
3. I-590 Refugee Application and supporting materials
4. I-589 Asylum Application and supporting materials
5. Excerpts of Immigration Court Proceeding Transcript - August 24, 2006
6. Excerpts of Immigration Court Proceeding Transcript - February 2, 2007
7. Excerpts of Immigration Court Proceeding Transcript - June 20, 2007
8. Excerpts of Immigration Court Proceeding Transcript - May 16, 2008
9. Excerpts of Immigration Court Proceeding Transcript - July 14, 2008
10. Documents in A-File showing defendant's English proficiency
11. Presidential Order appointing Athanase Munyemana Director of National Intelligence
- 11a. Translation
12. Personnel File from Sonarwa

13. Personnel File from Rwandan Government
14. Kinyarwanda Letters from Munyenyezi residence
- 14a. Translation
15. Letter dated 10/21/08 from Defendant's residence
- 15a. Translation
16. Defendant's passport
17. Asylum Officer memoranda dated October 19, 2004 from Defendant's residence
18. Declaration of Defendant dated 3/16/06 from Defendant's residence
19. Report of Defendant entitled Qualification of Massacres as Genocide in Rwanda by United Nations
20. Letter dated May 10, 1994 from Defendant's residence
- 20a. Translation
21. DoD Images of Butare in 1994
22. Record of border crossing in the United States by defendant
23. Department of State Cable pertaining to Rwanda Questionnaire completed by defendant
24. Certification of Revocation of defendant's Visa and supporting cable
25. Audio tapes of Immigration proceedings

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Alope Chakravarty
ALOE S. CHAKRAVARTY and
JOHN A. CAPIN
Assistant U.S. Attorneys

Certificate of Service

I do hereby certify that a copy of the foregoing response was served upon the counsel of record for the defendant by electronic notice on this 16th day of April 2012.

/s/ John A. Capin
Alope Chakravarty
Assistant U.S. Attorney